

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-C and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Barbara R. Binis

Barbara R. Binis

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Dated: April 17, 2015

EXHIBIT A - ANDRUS WAGSTAFF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-09489	Deborah Carden v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-03632	Tawny Haller, Michael Haller v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C. R. Bard, Inc., Tissue Science Laboratories Limited
2:13-CV-32492	Rose Ives v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-09954	Phyllis Nixon v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-17728	Debora Cleave-Trepus v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B - DOYLE LOWTHER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-27947	Stacey Hollier, Shayne Hollier v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C - WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-21913	Evangelina Jimenez, Thomas Jimenez v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis